

June 10, 2015

MEMORANDUM TO: Nathan Sanfilippo, Chief
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Andrew Waugh, Reactor Operations Engineer */RA/*
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING
GROUP PUBLIC MEETING HELD ON MAY 20, 2015

On May 20, 2015, the U.S. Nuclear Regulatory Commission (NRC) staff hosted the Reactor Oversight Process (ROP) Working Group (WG) public meeting with the Nuclear Energy Institute (NEI) ROP Task Force and other industry representatives. Enclosure 1 contains the meeting attendance list; and Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15148A471) contains the white papers and handouts discussed during the meeting; Enclosure 3 (ADAMS Accession No. ML15148A472) contains the Frequently Asked Questions (FAQs) Log and the FAQs discussed during the meeting. Meeting attendees discussed topics related to probabilistic risk assessment (PRA), assessment, and performance indicators (PIs).

The Security Performance Evaluation Branch (SPEB) staff from the Office of Nuclear Security and Incident Response indicated that it is updating the Force-on-Force inspection procedure. The staff expects to issue a revised procedure in October 2015. The staff noted that a public meeting would be held with the Force-on-Force WG on May 26, 2015.

The Reactor Inspection Branch (IRIB) staff discussed the regional differences in screening findings of very low safety significance. The staff communicated that it has published the questions used in the table-top exercises and those are available to the public (ADAMS Accession No. ML15139A501). The IRIB staff also discussed the status of inspection procedure revisions resulting from the Baseline Inspection Program enhancement project. The staff indicated that it expects to complete most revisions by the end of the calendar year. The Component Design Basis Inspection (CDBI) and the Problem Identification and Resolution (PI&R) procedures are scheduled for revision in 2016.

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NRC proposed that non-safety related Diverse and Flexible Coping Strategies (FLEX) equipment, used solely in response to beyond-design-basis external events, and in accordance with Section 11.4 of NEI 12-06, Revision 0, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guidance," would not be in scope of the Maintenance Rule unless otherwise required by Paragraph 50.65(b). As a result, subject to NRC rulemaking efforts to the contrary, FLEX equipment "integrated" into the Emergency Operating Procedures (EOPs) for use in beyond-design-basis external events would not be considered to be "used" in the EOPs per Title 10 of the *Code of Federal Regulations* (10 CFR) 50.65(b)(2)(i).

The Performance Assessment Branch (IPAB) staff communicated that the Commission briefing on the Result of the Agency Action Review Meeting (AARM) would be held on May 21, 2015. The staff shared that it would discuss ROP enhancements, industry trends, and changes to the ROP self-assessment process with the Commission. IPAB staff also mentioned that Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," was revised in April 2015 to incorporate changes to the cross-cutting issue process. The staff indicated that it is also finalizing a Commission notation vote paper suggesting the revision of the "degraded cornerstone" definition in IMC 0305. The staff provided an update on improvements to the Significant Determination Process (SDP). The staff indicated that Phase 1 of the review of the SDP was complete, which consisted of identifying improvements to streamline the current process. The staff is starting to work on Phase 2 of the review of the SDP, which consists on considering the implementation of a more holistic and risk-informed approach. The staff aims to complete Phase 2 in approximately 18 months.

IPAB staff also discussed the development of the ROP for new reactors (ADAMS Accession No. ML15138A314). The staff mentioned that while the ROP framework will remain unchanged, there will be changes needed in the PI, inspection, and SDP programs. The staff expects these changes to be mostly focused in the mitigating systems, initiating events, and barrier integrity cornerstones. The staff plans to develop potential revisions to the ROP and conduct public meetings and tabletop exercises through the second quarter of 2017, and finalize governance documents by the fourth quarter of 2018. The staff and industry representatives agreed to discuss proposed approaches for the development of the ROP for new reactors during the July ROP public meeting and have the next substantive discussion of the issue during the September ROP public meeting.

The IPAB staff also mentioned that the "Contact Us" email link is now available online for use by external stakeholders.

Industry representatives presented a white paper on recommended changes to IMC 0612, "Power Reactor Inspection Reports" (Enclosure 2). The recommendations included clarification and expansion of the examples presented in Appendix E "Examples of Minor Issues," and revisions to screening questions. Staff committed to evaluate the recommendations cited in the NEI white paper as part of the process underway to enhance IMC 0612.

In the area of the PI program, staff and industry addressed the following items:

- (1) The staff discussed the status of the update to the Archived FAQs website. The staff indicated that the Archived FAQs file was updated and was in the process of being published to the public website. The file has all FAQs archived prior to NEI 99-02 Rev 7.

- (2) The staff discussed the “Exclusion of Low Risk Trains/ Segments from Unavailability Monitoring” white paper. The staff requested that industry submit a generic FAQ with any proposed changes to the Mitigating System Performance Index (MSPI) indicator for the staff to review.
- (3) Industry indicated that the MSPI workshop will be held during July 27-29, 2015, in Richmond, VA.

Staff and industry discussed the following PI FAQs (see Enclosure 3):

- FAQ 15-01: This is a site-specific FAQ for Perry. During an unplanned scram, the Full Core Display indicated dual rod indication, both red and green lights for Rods Out and In, respectively. Operators utilized a second indication on the Rod Action Control System to verify rods were indeed inserted before proceeding with the normal scram response procedure. A question about the NEI guidance existed whether this should then count as a complicated scram (IE04). The staff agreed with the licensee that in this particular case, the complicated scram PI is not applicable because the operators were able to verify the condition of the reactor without exiting the normal scram response procedure. NEI committed to provide an update to the guidance in NEI 99-02, and the NRC would draft a closure response.

A public tele-conference will be held on June 17, 2015, to discuss FAQs, if necessary. The next ROP WG public meeting is scheduled to be held on July 15, 2015.

Enclosures:

1. Attendance List
2. Handouts Discussed
3. FAQ Log

- (2) The staff discussed the “Exclusion of Low Risk Trains/ Segments from Unavailability Monitoring” white paper. The staff requested that industry submit a generic FAQ with any proposed changes to the Mitigating System Performance Index (MSPI) indicator for the staff to review.
- (3) Industry indicated that the MSPI workshop will be held during July 27-29, 2015, in Richmond, VA.

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***concurred via email**

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DATE	6/01/15	6/05/15	6/10/15

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
May 20, 2015**

Scott Morris	NRC
Nathan Sanfilippo	NRC
Dan Merzke	NRC
Mary Anderson	NRC
Chris Cauffman	NRC
Zack Hollcraft	NRC
Juan Peralta	NRC
Jeff Mitman	NRC
Lynn Mrowca	NRC
Luis Cruz	NRC
Joe Willis*	NRC
Jim Slider	NEI
Victoria Anderson	NEI
Larry Parker	STARS Alliance
Tony Zimmerman	Duke Energy
Adrienne Driver	Duke Energy
Suzanne Leblang	Entergy
Lenny Sueper	Xcel Energy
Martin Murphy	Xcel Energy
Pete Wilson	TVA
Mark Acker	TVA
Doug McKinney	Southern Company
William Webster	Dominion
Robin Ritzman	First Energy
Roy Linthicum	Exelon
Steve Catron	NextEra Energy
Dave Kline*	NEI
Lance Sterling*	South Texas
Aaron Sanchez*	VC Summer
Bill Cachum*	Wolf Creek

*participated via teleconference and/or online meeting